

From: [Gloria-Small Moran](#)
To: [Rafael Casanova](#)
Cc: [Carlos Sanchez](#); [Robert Werner](#); [Gary Moore](#)
Subject: Falcon Refinery - Sale Document
Date: 03/09/2012 04:52 PM
Attachments: [2-23-12 Letter Agreement.pdf](#)

Rafael:

As we discussed this afternoon, please see the attached agreement relating to the sale of the Falcon Refinery site. As I mentioned to you, NORCO is interested, through the buyer, in resuming performance of the RI/FS. Because of this request from NORCO, the Enforcement team recommends that we cancel the site briefing for Falcon scheduled for next Thursday, March 15, 2012. Instead, the Enforcement team proposes that the Site Team and managers meet some time next week to discuss the issues, develop a recommendation on this issue, and then schedule a meeting with Sam/Pam some time during the following week of March 19.

Thanks,

Gloria Moran
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----- Forwarded by Gloria-Small Moran/R6/USEPA/US on 03/09/2012 04:22 PM -----

From: "Richard Bergner" <rbergner@rflaw.net>
To: Gloria-Small Moran/R6/USEPA/US@EPA
Cc: "Jonathan Carroll" <jcarroll@lazarusenergy.com>
Date: 03/08/2012 03:12 PM
Subject:

Gloria:

Per your telephone message yesterday afternoon and as you requested in your e-mail to me, dated February 24, 2012, I have attached herewith Letter Agreement, dated February 23, 2012, between National Oil Recovery Corporation and Lazarus Energy Holdings, LLC and Lazarus Texas Refinery I, LLC, covering in part the conveyance of the Falcon Refinery on February 29, 2012.

To keep the record straight, Lazarus Energy Holdings, LLC is the 80% parent of Blue Dolphin Energy Company (which is traded on the Nasdaq stock exchange), and the 100% parent of Lazarus Texas Refinery I, LLC.



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Section 4.1 of the Letter Agreement addresses the issue of Lazarus Energy Holdings, LLC and Norco using their combined best efforts post closing to cause the EPA to reinstate the RI/FS Agreed Order in favor of Norco.

Lazarus Energy Holdings, LLC intends to continue to use Stephen Halasz and his TRC personnel to complete the Removal Action and it would afor Mr. Halasz and his TRC crew to also finish up on the RI/FS AOC and Agreed Order.

Please call with any questions or comments you may have with respect to the attached Letter Agreement.

Richard F. Bergner



2-23-12 Letter Agreement.pdf